

From: Johnson, Dan - NRCS, Davis, CA [mailto:Dan.Johnson@ca.usda.gov]

Sent: Thursday, October 06, 2011 1:42 PM

To: Jemaa, Fethi Ben

Cc: Kiger, Luana - NRCS, Davis, CA

Subject: SBx7-7, Comments on 9-22-11 version of Proposed Regulation on Agricultural Water Measurement

Fethi,

We have a couple of suggestions for the group to consider:

- Section 597.4, d, 1 and elsewhere in the document it is implied that water measurement devices operation and maintenance are addressed. We suggest the group consider adding a subsection that explicitly discusses operation and maintenance (i.e. the need for an O&M plan, regular re-certification, etc.) beyond the initial certification of existing and new devices.
- The law describes water measurement as needed to facilitate volumetric pricing. We suggest the group consider the appropriateness of adding language to add value to farm delivery water measurement by providing water volume data to the farmer at the times and units they can use for on-farm water management.

Thank you for the opportunity to provide comments.

Dan Johnson

USDA, NRCS

Agency Team member